

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NORTHWEST BIOTHERAPEUTICS, INC.,

Plaintiff,

v.

CANACCORD GENUITY LLC, CITADEL  
SECURITIES LLC, G1 EXECUTION  
SERVICES LLC, GTS SECURITIES LLC,  
INSTINET LLC, LIME TRADING CORP.,  
SUSQUEHANNA INTERNATIONAL  
GROUP LLP, AND VIRTU AMERICAS LLC,

Defendants.

Case No. 1:22-cv-10185 (GHW) (GWG)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Declaration of William A. Burck and the exhibits attached thereto, and any other arguments or materials that the Court may consider before this motion is taken under submission by the Court, Defendants Citadel Securities LLC, Canaccord Genuity LLC, G1 Execution Services LLC, GTS Securities LLC, Instinet LLC, Lime Trading Corp., Susquehanna International Group, LLP, and Virtu Americas LLC will jointly move this Court, before the Honorable Gabriel W. Gorenstein, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an order (i) pursuant to Federal Rule of Civil Procedure 12(b)(6) and the Private Securities Litigation Reform Act, dismissing the Complaint (ECF No. 1); and (ii) granting all such other and further relief as this Court may deem just and proper.

Opposition and reply papers are to be filed pursuant to the Court's Order (ECF No. 83) and Rule 6.1 of the Local Rules of the United States District Court for the Southern District of New York.

Dated: March 20, 2023  
New York, New York

Respectfully submitted,

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